

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LORD ABBETT AFFILIATED FUND, INC.,  
*et al.*, Individually and On Behalf of All Others  
Similarly Situated,

Case No. 1:16-cv-112-MN

Plaintiffs,

v.

NAVIENT CORPORATION, *et al.*,

Defendants.

**LEAD COUNSEL'S MOTION FOR AN AWARD  
OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

Pursuant to Federal Rule of Civil Procedure 23(e) and this Court's Order Preliminarily Approving Settlement and Providing for Notice dated November 22, 2021 (D.I. 341), and upon (i) the Declaration of Jeremy P. Robinson in Support of (A) Lead Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation and (B) Lead Counsel's Motion for an Award of Attorneys' Fees and Litigation Expenses; (ii) the Brief in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Litigation Expenses; and (iii) all other papers and proceedings herein, Lead Counsel will and hereby do move this Court, before the Honorable Maryellen Noreika, on March 17, 2022, at 2:00 p.m. at the United States District Court for the District of Delaware, J. Caleb Boggs Federal Building, 844 N. King St., Wilmington, DE, Courtroom 4A, or at such other location and time as set by the Court, for entry of an Order awarding attorneys' fees and reimbursement of litigation expenses. A proposed Order granting the requested relief will be submitted with Lead Counsel's reply papers after the deadline for objecting to the motion has passed.

Dated: February 10, 2022

Respectfully submitted,

/s/ Christopher M. Foulds

Joel Friedlander (#3163)  
Christopher M. Foulds (#5169)  
**FRIEDLANDER & GORRIS, P.A.**  
1201 N. Market Street, Suite 2200  
Wilmington, DE 19801  
(302) 573-3500  
jfriedlander@friedlandergorris.com  
cfoulds@friedlandergorris.com

*Liaison Counsel for Lead Plaintiffs and the Classes*

**BERNSTEIN LITOWITZ BERGER &  
GROSSMANN LLP**

Salvatore Graziano (Admitted *pro hac vice*)  
Jeremy P. Robinson (Admitted *pro hac vice*)  
Jesse L. Jensen (Admitted *pro hac vice*)  
Robert F. Kravetz (Admitted *pro hac vice*)  
R. Ryan Dykhouse (Admitted *pro hac vice*)  
1251 Avenue of the Americas  
New York, New York 10020  
(212) 554-1400  
salvatore@blbglaw.com  
jeremy@blbglaw.com  
jesse.jensen@blbglaw.com  
robert.kravetz@blbglaw.com  
ryan.dykhouse@blbglaw.com

*Lead Counsel for Lead Plaintiffs and the Classes*